

NORTH SOMERSET CORE STRATEGY

EXAMINATION

ISSUE 3a-e
SPATIAL STRATEGY

ON BEHALF OF
PERSIMMON SPECIAL PROJECTS WESTERN

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Q3a. The degree of weight to be accorded to the draft Regional Strategy (RS) and the evidence that underpinned it with respect to the overall spatial strategy and broad locations for development.

- 3a.1 Persimmon Special Projects Western notes that the planning system is in the process of significant change, following the formation of the Coalition Government in June 2010, the Localism Bill and draft NPPF (ND/07). It is noted and acknowledged that the initial stages of plan making on the North Somerset Core Strategy were undertaken having regard to the content of the emerging draft Regional Strategy (RD/02). However, this no longer need be the case.
- 3a.2 The Localism Bill will eventually be enacted (Late 2011) and become operative and, amongst other things, result in the revocation and abolition of the Regional Strategies, including the Interim Regional Strategy (RPG10) (RD/05) and the Regional Spatial Strategy for the South West Proposed Changes (2008) (RD/02). Furthermore, through the passage of time, the evidence base which underpinned the emerging draft Regional Strategy, which was tested at Examination in Public between April and June 2007, will become increasingly dated and potentially less relevant as a planning consideration. However, it is acknowledged, until the Localism Bill actually becomes operative and the Regional Strategies abolished, the Courts in response to various challenges mounted by Cala Homes have clarified the status of the emerging Regional Strategies and their evidence bases and confirmed they remain material considerations. In terms of PPS12, it is considered that the relevant Regional Spatial Strategy to this examination is RPG10 (September 2001). (RD/05)
- 3a.3 Therefore, this examination should be conducted on the basis that the Interim Regional Strategy (RPG10) (RD/05) remains part of the statutory development plan as do the 'Saved' policies of the Joint Replacement Structure Plan (2002) (RD/01). However, as the draft Regional Spatial Strategy (RD/02) document was never finalised, it never achieved full Development Plan status. Thus the emerging Regional Spatial Strategy should only be accorded little or limited policy weight at this Examination. However, the supporting draft RS evidence base should be considered and re-assessed at this examination, as necessary and appropriate, alongside any other relevant more up-to-date and locally derived evidence. (See Examination Library)
- 3a.4 It is noted that the Bristol City Core Strategy Inspector (ED/23 para 12), and others, consider that there is no realistic prospect of the previously emerging RSS ever becoming part of the development plan. Thus, in the context of this examination, the emerging draft RSS itself should be accorded little policy weight, amongst other things to follow this approach would ensure a degree of consistency between the respective Inspector's Reports in the West of England area.
- 3a.5 It follows that the broad locations of development included in the draft Regional Strategy (RD/02) should also only be accorded limited weight. Given the position taken by the Council regarding the Bristol-Bath Green Belt, it is difficult to see how the Core Strategy could remain sound through the introduction of a major development location at South West Bristol at this stage in the plan making process, which has not been subject to public consultation as a Council proposed allocation for inclusion in the Submission Draft Core Strategy nor does it have the support of the Council. However,

it is acknowledged that this location was previously the subject of consultation by the Council during an earlier stage of plan preparation (Issues & Options Stage 2007) (SD/39) was subject to consultation as part of the draft Regional Strategy and has been the subject of public consultation by development interests, associated with the submitted planning application.

- 3a.6 In summary, whilst only little or limited weight should be accorded to the draft Regional Strategy (RD/02) at this Examination, it's evidence base should be re-assessed relative to more up-to-date and locally derived relevant evidence to inform the examination, as necessary and appropriate.

Q3b. Green Belt – Implications of the Core Strategy compared to the draft RS.

- 3b.1 Persimmon Special Projects Western consider that the Core Strategy (Policy CS6) should incorporate some further flexibility to allow for limited small scale changes to the Green Belt to be made through the lower tier development plan documents (e.g. Site Allocations DPD and the Development Management DPD) should a need for such releases be justified and sustainable. The policy, as drafted, is ineffective in terms of PPS12 para 4.46 (NP/11), as it lacks sufficient flexibility to enable suitable limited small scale changes to be made to the Bristol-Bath Green Belt through the lower tier development plan documents, where sustainable development opportunities arise.
- 3b.2 It should be noted that Persimmon is **not** seeking major revisions to the general extent of the Bristol-Bath Green Belt in North Somerset through this Core Strategy. However, this issue may need to be revisited through the preparation of the new Local Plan, or a partial review of the Core Strategy, having regard to the scale of future housing need and demand in the Bristol and North Somerset areas. Account will need to be given to the duty to co-operate and the approach of South Gloucestershire Council and Bath & North East Somerset Council.
- 3b.3 The implications of the Core Strategy on the Bristol – Bath Green Belt, compared to the draft Regional Strategy (RD/02) are self evident. The Core Strategy (Policy CS6) states that within North Somerset the boundaries of the Bristol – Bath Green Belt will remain **unchanged** during the plan period. Whereas Policy HMA 1 The West of England HMA of the draft RS states that the general extent of the Bristol and Bath Green Belt will be maintained subject to alterations in respect of Royal Portbury Docks and Bristol International Airport and the removal of the Green Belt to accommodate various urban extensions including Area of Search 1A. Area of Search 1A is for 10,500 dwellings, including 9,000 dwellings within North Somerset. (See Response to Issue 3c below) Clearly, without the Green Belt revision, the level of development likely to be delivered in North Somerset would be significantly less than were it to be included. It should be noted that the underlying spatial strategy of the draft RS, as regards to the future growth of Greater Bristol, was to seek to concentrate development where the need and demand was arising and where future economic development stood the best prospect of being achieved.
- 3b.4 If the proposals in Policy HMA1 of the draft Regional Strategy (RD/02) are to be reflected in the North Somerset Core Strategy, a major change to the general extent of the Bristol – Bath Green Belt in North Somerset would be necessary, such a change would appear to conflict with the draft NPPF paras 133 – 144 (ND/07), The Coalition Programme for Government para 4 and PPG2 (NP/03).
- 3b.5 Persimmon notes that, whilst only limited weight should be afforded to it, the draft NPPF highlights the great importance the Coalition Government attaches to Green Belts. This carries forward similar commitments in PPG2.
- 3b.6 Consistent with Persimmon’s call for the urgent preparation for a new Local Plan for North Somerset, the draft NPPF makes clear that LPAs, with Green Belts in their area, should establish Green Belt boundaries in their Local Plans. (ND/07 para 137) Therefore, North Somerset Council should urgently reassess the general extent of its

Green Belt, having regard to the development pressures arising from the future growth of Bristol and North Somerset and the previously stated objectives of the Bristol-Bath Green Belt.

- 3b.7 It is useful to have regard to the Inspector's Report into the Bristol City Council Core Strategy DPD (March 2011) (ED/23) in respect of his conclusions regarding the Bristol-Bath Green Belt. The Inspector rejected the proposed deletion of all references to a contingency for future development in the Green Belt and of cross boundary working with adjoining authorities if urban extensions were to emerge in the plans of those authorities.
- 3b.8 Para 52 of the Bristol City Core Strategy Inspector's Report (ED/23) acknowledges that the only way that substantial additional housing pressure could be accommodated would be via urban extensions in the Green Belt and these would largely be beyond the city's boundary, as was proposed in the emerging RSS. The opposition of the relevant adjoining councils to such development effectively precludes any current strategy that sought a more comprehensive approach to potential needs and opportunities. It would be unreasonable to expect the (Bristol) City Council to explore cross boundary urban extension at a time when the neighbouring authorities are opposed to such development and there is no higher tier of planning being actively pursued to promote such an approach. Nonetheless, as this plan is the first Core Strategy of the West of England authority to be examined, it would be short sighted to rule out the possibility of a cross boundary approach to development in the Green Belt in future. The Localism Bill may also require adjoining authorities to co-operate on cross boundary issues.
- 3b.9 In summary, the Core Strategy, as submitted, does not include a major change to the general extent of the Green Belt, notwithstanding the irrefutable overall housing justification (See Table 1), whereas the Core Strategy, were it to reflect the draft RS, would need to include the South West Bristol Urban Extension and a major revision to the general extent of the Green Belt. This change would constitute significantly more than a minor or focussed change to the Core Strategy in terms of PPS12.

Q3c. South West Bristol Urban Extension – including consideration of its deletion from the Core Strategy compared with the draft RS.

- 3c.1 In light of the other comments of Persimmon, on balance Persimmon considers that the Core Strategy should **not** be amended to incorporate the South West Bristol Urban Extension, at this late stage of the Core Strategy preparation, to do so would conflict with the Coalition Government's position on the Green Belt and would potentially be inconsistent with the adjoining Bristol City Core Strategy DPD.
- 3c.2 However, in light of the irrefutable growth pressures arising at Bristol and from within North Somerset itself, Persimmon consider that the Council should urgently re-assess the overall housing provision, in conjunction with Bristol City Council and others, through the preparation of a new Local Plan, having regard to the duty to co-operate, set out in the Localism Bill, or a partial review of the Core Strategy.
- 3c.3 It is noted that the above approach would delay the implementation and delivery of a potential South West Bristol urban extension. However, the detailed requirements of the respective local planning authorities would need to be determined and set out in the new Local Plans and enable any infrastructure requirements to be identified and co-ordinated. Public Consultation on the new plan and engagement and co-ordinated delivery of infrastructure and the inevitable implications for the Green Belt will be essential to progress this proposal, particularly in the context of Localism and the draft NPPF.
- 3c.4 It is further noted that an earlier version of the emerging Core Strategy (Issues and Options Stage) (SD/39), which predates the General Election in May 2010, included provision, not only for 9,000 additional dwellings at Weston-super-Mare but also an urban extension at South West of Bristol, based on a much higher level of development than now proposed. Whilst various options at South West Bristol were subject to public consultation, an urban extension at South West Bristol never formed part of the Council's Consultation Draft or Submission Draft Core Strategy. The various South West Bristol Urban Extension proposals in the Issues and Options document would need to be amended and subject to further consultation and sustainability appraisal, before the Core Strategy could be adopted in its final form, should the Inspector be minded to recommend the reinstatement of the South West Bristol Urban Extension, particularly given the implications for the Bristol-Bath Green Belt. It is difficult to envisage this occurring in the short term.
- 3c.5 Therefore, it is self evident that the Core Strategy is out of accord with the draft RS (RD/02) Policy HMA1 given the omission of 9,000 dwellings within Area of Search 1A. However, as previously stated, only little or limited policy weight can be accorded to the draft Regional Strategy at this examination in any event, particularly in light of its forthcoming demise and the fact that it currently does not form part of the development plan for North Somerset.
- 3c.6 The future of the South West Bristol Urban Extension appears inextricably linked to the revision of the Bristol-Bath Green Belt. Had the draft Regional Strategy been completed, it would have altered the general extent of the Green Belt and identified a broad location for the development of 9,000 dwellings with Area of Search 1A in North

Somerset and resulted in the replacement of the Joint Regional Structure Plan. As the draft RS was not completed, there appears to be no specific higher tier policy requirement for the Council to specifically include the South West Bristol Urban Extension in the draft Core Strategy if it chooses not to do so.

- 3c.7 However, it is acknowledged that Policy SS4 of RPG10 does require local authorities when preparing their development plans, to critically review the Green Belt to examine whether boundary alterations are needed to allow for long term sustainable development needs and remove land from the Green Belt for development if, on balance, this would provide the most sustainable solution for accommodating future development requirements.
- 3c.8 The Inspector is encouraged to highlight this requirement in his report.
- 3c.9 In summary, notwithstanding the case for additional housing in North Somerset, Persimmon consider that the Core Strategy should not be amended to include the South West Bristol Urban Extension at this stage. However, this option, together with other alternative options, should be reconsidered through the new Local Plan.

Q3d. Weston Villages development as the main strategic provision of the Core Strategy, including by comparison with the draft RS provision for an urban extension SE of Weston.

- 3d.1 Persimmon Special Projects Western supports the inclusion of the proposed Weston Villages development as the main strategic provision of the Core Strategy, as set out in the Core Strategy compared to the proposal in the draft Regional Strategy. (See Policy CS30 Weston Villages and the Western Villages SPD Sept 2011).
- 3d.2 However, it must be emphasised that the inclusion of the current reduced scale Weston Villages proposal in the Core Strategy is not dependent upon draft Regional Strategy Policy HMA1, which includes an Area of Search 1H for 9,000 new homes to the south east of Weston-super-Mare.
- 3d.3 As stated above, Persimmon considers that the draft Regional Strategy, including Policy HMA1, (RD/02) should only be accorded little or limited policy weight at this examination.
- 3d.4 Persimmon Homes is a major landowner within the proposed Weston Villages area for development. Persimmon owns the majority of the former Weston Airfield (175 ha). It has been working collaboratively with the other primary landowners, including the Council, who are central to the delivery of development on the details of emerging Winterstoke Village proposals.
- 3d.5 It should be noted that some land at Weston Airfield is already allocated for development in the Replacement Local Plan, having been tested at the Local Plan Inquiry. (SD/17) (See Policy E1/c)
- 3d.6 Furthermore, there is already a 900 dwelling scheme, which is subject to a minded to approve resolution at Weston Airfield. Persimmon is actively progressing the details of an additional planning application for the remainder of Weston Airfield/ Winterstoke Village with the Council. The new scheme comprises approximately 1,500 dwellings together with other uses. The new application will be submitted in Spring 2012.
- 3d.7 It is noted that Policy HMA1 of draft RS (RD/02) seeks 9,000 new homes to the south east of Weston-super-Mare. Key Diagram Inset 1 for the West of England Housing Market Area shows Area of Search 1H as being east of the railway line and west of the M5 Motorway. It is self evident from a comparison between RS Inset 1 and Inset Diagram 2 of the Core Strategy, that the RS Policy HMA1 was intended to cover a much larger area than now proposed and bring forward a significantly higher level of development at Weston. It is acknowledged that this higher level of development was consulted upon by the Regional Planning Body, the Secretary of State in the Regional Strategy consultation and the Council in the Issues & Options Consultation (SD/39) and the Consultation Draft (SD/40) However, the Council revised its position regarding the scale of development considered appropriate at Weston Villages in the Key Change Consultation (October 2010) following the May 2010 General Election and the formation of the Coalition Government. (SD/41)

- 3d.8 Policies CS14 and CS30 of the Core Strategy provide for around 5,500 new homes at the Weston Villages, as shown on Inset Diagram 2, focussed on two urban villages Winterstoke Village at Weston Airfield and Parklands Village at RAF Locking.
- 3d.9 Therefore, it is clear that the current Core Strategy proposals for Weston Villages are distinctly different from those sought by the draft Regional Strategy Policy HMA1 Area of Search 1H, particularly in terms of the scale of development envisaged during the plan period, the proposed extent of development and the infrastructure required.
- 3d.10 The Weston Villages proposals are not dependent upon the finalisation of the draft Regional Spatial Strategy (RD/02). They are locally derived and justified and have been subject to consultation. Furthermore, the details of the Weston Villages proposals have been consulted upon through the Draft Weston Villages SPD between September – October 2011. (ED/10) (See Draft Weston Villages SPD September 2011).
- 3d.11 Weston-super-Mare is the largest settlement in North Somerset and has a range of employment and social and physical infrastructure. It is a sustainable location and has capacity, subject to the provision of necessary infrastructure and sensitive design, to accommodate additional development. Persimmon support the identification of the Weston Villages proposal within the Core Strategy, subject to the comments expressed elsewhere in the statements of Persimmon.
- 3d.12 The Weston Villages area is very well related to the existing urban area of Weston-Super-Mare and the areas identified for development are principally land of lower environmental quality. The development area will deliver much needed infrastructure and affordable housing benefits to Weston-super-Mare during the remainder of the plan period.
- 3d.13 It is noted that the early versions of the Core Strategy were prepared to more closely reflect the emerging Draft Regional Strategy. However, these pre-date the May 2010 General Election and the subsequent formation of the Coalition Government. Thus they predate the significantly changed planning and political context of the Coalition Programme for Government, the Localism Bill and the draft NPPF.
- 3d.14 In summary, Persimmon support the inclusion of Weston Villages in the Core Strategy, and note the proposal is significantly different to the proposed urban extension south east of Weston-Super-Mare, included in Policy HMA1 of the Draft Regional Strategy (RD/02). The details of the current policy have evolved locally, and has been subject to specific consultation. Persimmon Homes are seeking to actively deliver the Winterstoke Village proposal, in accordance with the Core Strategy and emerging Weston Villages SPD, subject to the comments expressed elsewhere in the Statements of Persimmon.

Q3e. Distribution of housing and employment by existing settlement:

- i) Weston super Mare**
 - ii) Nailsea**
 - iii) Clevedon**
 - iv) Portishead**
 - v) Service Villages including appropriateness of designations**
 - vi) Infill Villages including appropriateness of designations**
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- 3e.1 The distribution of new housing by existing settlement is set out in Policy CS14 and the distribution of employment is set out in Policy CS20 and on page 85 of the Core Strategy. These are summarised in the Table 2. (See Table 2)
- 3e.2 For the purposes of the Core Strategy Examination, Persimmon Special Projects Western do not seek to challenge the proposed distribution of housing or employment in detail. However, the Core Strategy would benefit from greater flexibility to guide the Site Allocations DPD process.
- 3e.3 Given the predominance of Weston-super-Mare in the settlement hierarchy of North Somerset, its scale, role and function, it is appropriate that the majority of new housing and employment development is directed to the town, including at the Weston Villages proposal.
- 3e.4 However, to achieve sustainable development during the plan period and to respond to opportunities to plan for growth, the housing and employment needs of the other settlements in North Somerset should also be addressed by the Core Strategy and in turn by the new Local Plan.
- 3e.5 Given that the Core Strategy should only include strategic sites, in accordance with PPS 12 para 4.6¹, it is appropriate for the smaller scale allocations to be made in the Site Allocations DPD, in accordance with Policies CS14, CS31, CS32 and CS33. However, it is important that the Core Strategy and Site Allocations DPD incorporate sufficient flexibility to ensure their effectiveness.
- 3e.6 It is clear from the Localism Bill and draft NPPF that the Coalition Government expects the local planning authorities to progress, as a matter of urgency, the new Local Plans. Therefore, the Council may well be encouraged or required to prepare a Local Plan rather than the outstanding DPDs. This potentially could have a bearing upon particular settlements in North Somerset, the scale of development to be accommodated and the delivery of development. If the Site Allocations DPD is not to be undertaken, it follows that the new Local Plan should take forward these matters.
- 3e.7 In summary, Persimmon generally accepts the proposed distribution of housing and employment, provided the Core Strategy incorporates some flexibility to enable growth to be planned at the other settlements beyond Weston-Super-Mare. The urban focus upon Weston-super-Mare is supported, in particular the proposals for the Weston Villages.

¹ PPS 12 Local Spatial Planning Para 4.6 (2008)

Table 1 Housing Provision in North Somerset & Neighbouring Districts Relative to ONS 2008 Household Projections (Dwellings)

	Core Strategy ONS 2008 Difference		
	Projections		
	Converted		
	To Dwellings		
	No. of	No. of	No. of
	Dwellings	Dwellings	Dwellings
North Somerset	14,000	37,620	-23,620
Bristol City	30,600	75,240	- 44,640
Bath & North East Somerset	11,000	16,720	- 5,720
South Gloucestershire	21,300	32,320	- 11,020
Sub Total Former Avon	76,900	161,900	- 84,000
Mendip	9,130	10,450	-1,320
Sedgemoor	10,100	12,540	-2,440
Sub Total Adjacent Somerset Districts	19,230	22,990	-3,760
Total	96,130	184,890	-87,760

Notes

ONS 2008 based household projections converted to dwellings via a 4.5% allowance

Table 2 Summary of Proposed Core Strategy Housing and Employment Distribution

<i>Area</i>	<i>Net Additional Dwellings 2006-26</i>	<i>Employment Hectares</i>
Weston Urban Area (Excluding Weston Villages)	3,300	43.82
Weston Villages	5,500	37.70
Clevedon, Nailsea & Portishead	3,400	
Clevedon West of Kenn Road		8.95
Nailsea		1.40
Portishead		3.17
Service Villages	750	
Other Settlements and Countryside	450	
Remainder of District		18.87
Total	13,400	113.91